

LEVY RATNER, P.C.

Richard A. Levy
Daniel J. Ratner
Daniel Engelstein^{*}
Gwynne A. Wilcox[^]
Pamela Jeffrey
Owen M. Rumelt
Kevin Finnegan
Carl J. Levine[^]
David Slutsky[^]
Allyson L. Belovin
Suzanne Hepner^{*}
Richard Dorn
Robert H. Stroup

Attorneys at Law
80 Eighth Avenue, 8th Floor
New York, New York 10011-5126

Telephone (212) 627-8100
Telecopier (212) 627-8182

www.levyratner.com

Dana E. Lossia[^]
Susan J. Cameron[^]
Micah Wissinger^{*}
Ryan J. Barbur
Vanessa Flores[^]
Alexander Rabb
Michael R. Hickson
Shira T. Roza
Laureve D. Blackstone[^]

Counsel:
Paul Schachter[^]
Anthony DiCaprio
Michael Steven Smith
David P. Horowitz[†]



June 14, 2012

VIA ECF

Hon. Nicholas G. Garaufis
United States District Court for
the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States, et al. v. City*, No. 07-cv-2067 (NGG) (RLM)

Dear Judge Garaufis:

Plaintiffs-Intervenors write to respectfully request permission to submit an oversized brief of not more than fifty-five (55) pages in support of their motion for an award of interim attorneys' fees and costs, which shall be served on Defendants on June 15, 2012. Due to the lengthy history of this litigation (and pre-complaint representation of the Intervenors) and the numerous motions, hearings and compliance activities engaged in by counsel, as well as the multiple legal issues relevant to Intervenors' entitlement to the rates they request, we have found that additional pages are necessary in order to provide a complete account of the factual and legal bases for the requested fees. The United States consents to the Intervenors' request.

Defendants object to this request and ask that if the Court permits Intervenors to submit additional pages it also permit the City to submit a brief of not more than 55 pages and increase the City's time to respond by 2 weeks. Plaintiffs-Intervenors oppose any extension of the City's time to respond to our motion, given that the agreed-upon schedule approved by the Court on February 23, 2012 already gives the City more than 7 weeks – until August 7, 2012 – to respond.

Respectfully submitted,

Dana E. Lossia

TO: All counsel via ECF.

56-001-00001: 10123192